

2008-3170
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Attorney for Wachovia Mortgage, FSB f/k/a World Savings Bank, FSB
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:	:	Case No. 11-12509-MBK
James Breazzano	:	
	:	Hearing Date: 8/8/2011 at 10:00 AM
	:	
Debtor(s)	:	Judge: Honorable Michael B. Kaplan
	:	
	:	Chapter: 13

NOTICE OF MOTION FOR ORDER VACATING AUTOMATIC STAY
AS TO REAL PROPERTY

James Breazzano
65 US Highway 202 Apt. A
Ringoes NJ 08551

Marc C. Capone, Esquire
60 Highway 71, Unit 2
Spring Lake Heights NJ 07762

Albert Russo, Trustee
CN 4853
Trenton NJ 08650-4853

PLEASE TAKE NOTICE that the undersigned attorney for Wells Fargo Bank, N.A. servicing agent for Wachovia Mortgage, FSB f/k/a World Savings Bank, FSB, will apply to the United States Bankruptcy Court located at 402 E. State Street, Trenton, New Jersey, for an Order to vacate the automatic stay to authorize the moving party to prosecute a foreclosure action for the reason that the debtor has materially defaulted in the plan by failing to make regular mortgage

payments outside the plan.

TAKE FURTHER NOTICE that the moving party waives oral argument and shall be relying upon the certification submitted herewith. Costs and a counsel fee will also be requested. The property involved is known as 855 Sycamore Avenue, Tinton Falls Borough, NJ.

POWERS KIRN, LLC
Attorneys for Wachovia Mortgage, FSB f/k/a World
Savings Bank, FSB

By: /s/ William M. E. Powers III
William M. E. Powers III

Dated: July 19, 2011